

EXHIBIT 2



Re: Continuing MTD Hearing / Garcia v. Roblox

From: Robert Salgado <rsalgado@counterpointfirm.com>
Date: Mon 10/13/2025 1:55 PM
To: White, Benjamin <Benjamin.White@procopio.com>; Nallely Nungaray <nnungaray@counterpointfirm.com>; Yasmine Jimenez <yjimenez@counterpointfirm.com>; Morgan D. Ross <Morgan@counterpointfirm.com>
Cc: Harwell, Elaine F. <Elaine.Harwell@procopio.com>; Sullivan, Sean M. <sean.sullivan@procopio.com>
Bcc: Clio Manage (03748- Roblox federal) <1d8c155c-7dfa-4db7-8391-f0c6515138b9@outlook.clio.com>

Thank you for the warning.
Unfortunately, we will oppose any motion to continue the hearing date on the motion to dismiss.

Kind regards,
Robert

From: White, Benjamin <Benjamin.White@procopio.com>
Sent: Monday, October 13, 2025 10:19 AM
To: Robert Salgado <rsalgado@counterpointfirm.com>; Nallely Nungaray <nnungaray@counterpointfirm.com>; Yasmine Jimenez <yjimenez@counterpointfirm.com>; Morgan D. Ross <Morgan@counterpointfirm.com>
Cc: Harwell, Elaine F. <Elaine.Harwell@procopio.com>; Sullivan, Sean M. <sean.sullivan@procopio.com>
Subject: Continuing MTD Hearing / Garcia v. Roblox

Counsel,
Please be advised that Defendant Roblox intends to apply *ex parte* to continue the motion to dismiss hearing. The Court continued the MTD hearing to November 14 to allow time to resolve the threshold issue of arbitration. We are not aware of any Court order on conducting the hearings simultaneously (26f report contemplated a MTCA hearing on November 5). As Roblox prepared to file the MTCA, November 14 was the only available hearing date within the notice period and not blocked off on the Court's calendar. Accordingly, we asked whether Plaintiffs would stipulate to continue the hearing if we noticed it for November 14. We received no response and filed the motion the following Monday, noticed for November 14. Plaintiffs' counsel later informed us that Plaintiffs would like the motions heard simultaneously.

Roblox simply seeks to continue the MTD hearing to ensure the MTCA is heard first as originally contemplated. Please let us know by the end of the day whether Plaintiffs would oppose this application or simply stipulate to continue the hearing. We would of course prefer to avoid motion practice.

Regards,
BENJAMIN WHITE
ASSOCIATE

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